

1 Adam J. Zapala (245748)
2 azapala@cpmlegal.com
3 Elizabeth Castillo (280502)
4 ecastillo@cpmlegal.com
5 **COTCHETT, PITRE & McCARTHY, LLP**
6 San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

7 Michael P. Lehmann (77152)
8 mlehmann@hausfeldllp.com
9 Christopher Lebsack (184546)
10 clebsack@hausfeldllp.com
11 Seth R. Gassman (311702)
12 sgassman@hausfeldllp.com
13 **HAUSFELD LLP**
600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Telephone: (415) 633-1908
Facsimile: (415) 358-4980

13 *Lead Counsel for Plaintiffs*

14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17 IN RE TRANSPACIFIC PASSENGER
18 AIR TRANSPORTATION ANTITRUST
19 LITIGATION

Civil Action No. 3:07-CV-05634-CRB

MDL No: 1913

20 **This Document Relates to:**
21 **ALL ACTIONS**

DECLARATION OF JOEL K. BOTZET
RE: POST-DISTRIBUTION
ACCOUNTING

1 JOEL K. BOTZET declares and states that:

2 1. I am a Program Manager for Rust Consulting, Inc. (“Rust Consulting”), the
3 Court-appointed Claims Administrator for the class action Settlement in this case. My business
4 address is 625 Marquette Avenue, Suite 900, Minneapolis, Minnesota 55402-2469. My business
5 telephone number is 612-359-2035. I am authorized to make this declaration on behalf of Rust
6 Consulting.
7

8 2. Rust Consulting has extensive experience in class action matters, having
9 provided settlement administration services in class action lawsuits affecting millions of class
10 members in cases involving employment, consumers, banking and financial services, property,
11 insurance, securities, and products liability, among its more than 8,000 projects.
12

13 3. Except as otherwise stated, I am fully familiar with and have personal knowledge
14 of the matters stated in this declaration and am competent to testify about them if called upon to
15 do so.

16 4. I submit this declaration to provide the Court and the parties to the above-
17 captioned action with information regarding the Post-Distribution Accounting.
18

Notice Sent

19 5. On June 25, 2018, Rust caused Postcard Notice of the ANZ, EVA, China
20 Airlines, and PAL Settlements to be sent via the United States Postal Service (“USPS”) to 45,406
21 potential Class Members who submitted a claim in a previous settlement. 44,782 of these notices
22 were not returned as undeliverable.
23

24 6. On July 8, 2019, Rust caused notice of the All Nippon Airways (“ANA”)
25 Settlement to be sent:
26

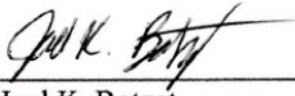
- 27 a. Via email to 47,328 potential Class Members who either submitted a
28 claim in a previous settlement or who registered during the certification

1 program for the litigation with ANA. 42,412 of the email notices were sent to
2 valid email addresses that did not fail or bounce back as undeliverable.

3 b. Via USPS to 7,834 potential Class Members who submitted a claim in a
4 previous settlement and for whom no email contact information was available.
5 7,259 of the mailed notices were not returned as undeliverable.
6

7 7. I declare under penalty of perjury under the laws of the United States that the
8 foregoing is true and correct to the best of my knowledge.

9 Executed this 7th day of April, 2022 in Minneapolis, Minnesota.
10

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13 _____
14 Joel K. Botzet
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